

STATEMENT OF BASIS
Three Corners Regional Landfill
Cherokee, County
Facility No. 303-0008

Introduction

On May 12, 2015, Alabama Waste Disposal Solutions, LLC submitted a Title V Major Source Permit renewal application for their municipal solid waste landfill with a gas collection system and flare (SIC #4953). Three Corners Regional Landfill currently has a Major Source Operating Permit for a Municipal Solid Waste Landfill with a design capacity of greater than 2.5×10^6 Megagrams with a gas collection and control system (GCCS) and flare. The Three Corners Regional Landfill is located at 2205 County Road 6 in Peidmont, Alabama.

Potential emissions are as follows:

Pollutant	Potential Emissions (tpy)
PM ₁₀ /PM _{2.5}	11.83
SO ₂	39.44
NO _x	27.13
CO	147.60
NMOC (Uncontrolled)	24.9
NMOC (Controlled)	1.5
VOC	10.2
HAPs	4.8

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Requirement

The facility is subject to Standards of Performance for New Stationary Sources (NSPS) 40 CFR 60 Subpart WWW-Standards of Performance for Municipal Solid Waste Landfills because it has a design capacity greater than 2.5×10^6 Megagrams. Three Corners also has uncontrolled NMOC emissions greater than 50 Megagrams per year and has thus installed a gas collection and control system and is subject to the operational standards, and monitoring, recordkeeping, and reporting requirements for a GCCS. In November 2008, Three Corners Regional Landfill received a written determination from EPA stating that when the leachate collection risers (LCRs) are not connected to the gas collection system they are not subject to the NSPS requirements if they are sealed to prevent emissions to the atmosphere and the 500 ppm methane surface concentration can be met without utilizing the gas collection system.

Three Corners is also subject to Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills. Subpart AAAA requires that Municipal Solid Waste Landfills comply with the requirements of 40 CFR Part 60, subpart WWW with the exception that the annual report required by 60.757(f) be

submitted on a semi-annual basis rather than an annual basis. Subpart AAAA also requires MSW Landfills to keep the records and reports specified in the general provisions of 40 CFR part 60.

In addition to the requirements of the NSPS and NESHAP, the flare is also subject to the requirements of 40 CFR 60.18 covering general control device and work practice requirements.

The potential VOC emissions from the landfill are less than 250 tons per year; therefore the facility is not subject to PSD.

Monitoring of emissions

Three Corners Regional Landfill maintains records on site records of design capacity, waste in place, and year to year waste acceptance rates and other records to show compliance to the New Source Performance Standard 40 CFR 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills.

The flare is monitored to insure the continuous presence of a flame. Also the gas flow rate to the flare is monitored. The flare is operated in accordance with the requirements of 40 CFR 60.18.

CAM is not applicable as Three Corners is subject to NSPS and MACT standards which were both promulgated after November 15, 1990. According to 40 CFR 64.2(b)(1)(i), on exemptions from Compliance Assurance Monitoring, emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act are exempt from CAM requirements, and there are no other source specific standards applicable to this facility.

Recommendation:

I recommend that the Three Corners Landfill be issued the enclosed Title V permit 414-0013 with units: (X001) for a Municipal Solid Waste Landfill with a design capacity of greater than 2.5×10^6 Megagrams with a gas collection system and flare.

John Robert Gill
Chemical Branch
Air Division

September 11, 2015